

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Hearing Date: September 11, 2025 at 1:00 p.m. (ET)

Objection Deadline: September 4, 2025 at 4:00 p.m. (ET)

Ref. Nos. 31794 & 31803

**CERTIFICATION OF COUNSEL REGARDING FTX RECOVERY TRUST’S ONE
HUNDRED EIGHTY-SEVENTH (NON-SUBSTANTIVE) OMNIBUS OBJECTION TO
CERTAIN CLAIMS FILED AGAINST THE INCORRECT DEBTOR**

I, Matthew R. Pierce, counsel to the FTX Recovery Trust², hereby certify as follows to the best of my knowledge, information and belief:

1. On July 22, 2025, the FTX Recovery Trust filed the *FTX Recovery Trust’s One Hundred Eighty-Seventh (Non-Substantive) Omnibus Objection to Certain Claims Filed Against the Incorrect Debtor* [D.I. 31794, redacted & 31803, sealed] (the “Objection”).

2. Pursuant to the Notice of Objection [D.I. 31794-1 & 31803-1], any responses were to be filed no later than September 4, 2025, at 4:00 p.m. (ET) (the “Response Deadline”).

3. The FTX Recovery Trust received informal response (the “Informal Responses”) to the Objection from counsel to the holders of claim numbers 80028 and 85328.

4. As of the Date hereof, no other responses to the Objection have been filed or served

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

on the FTX Recovery Trust.

5. The FTX Recovery Trust consensually resolved the Informal Responses without changes to the proposed form of order (the “Proposed Order”), which is attached hereto as **Exhibit A**. In accordance with the Court’s electronic order processing procedures, a copy of the Proposed Order shall be uploaded to CM/ECF.

6. Accordingly, the FTX Recovery Trust respectfully requests that the Court enter the Proposed Order at its earliest convenience.

Dated: September 16, 2025
Wilmington, Delaware

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/s/ Matthew R. Pierce

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